

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re: Joseph A. Saraceni : Chapter 13  
:   
: No. 17-11397-AMC  
Debtor(s) :

.....  
**NOTICE OF MOTION, RESPONSE DEADLINE  
AND HEARING DATE**

Movant, has filed a **Motion to Avoid Judicial Lien of Origen Capital Investments II LLC** with the Court. YOUR rights may be affected. You should read these papers carefully and discuss them with your attorney , if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)

1. If you do not want the Court to grant the relief sought in the motion or if you want the court to consider your views on the motion, then on or before October 23, 2017 you or your attorney must do all of the following:

- (a) file an answer explaining your position at:  
United States Bankruptcy Court  
900 Market Street, Suite 400  
Philadelphia, PA 19107-4299

If you mail our answer to the Bankruptcy Clerk's office for filing, you must mail it early enough so that it will be received on or before the date stated above; and

- (b) mail a copy to the Movant's attorney:  
Stanley E. Luongo, Jr., Esquire  
LUONGO BELLWOAR, LLP  
213-215 West Miner Street  
West Chester, PA 19382  
Phone: (610) 430-6600  
Fax No.: (610) 344-7585

2. If you or your attorney do not take the steps described in paragraphs 1(a) and 1(b) above and attend the hearing, the court may enter an order granting the relief requested in the motion.

3. A hearing on the motion is scheduled to be held before the Honorable Ashely M. Chan on November 14, 2017, at 11:00 a.m. in Courtroom 5, United States Bankruptcy Court, 900 Market Street, Philadelphia, PA 19107-4298. Unless the court orders otherwise, the hearing on this contested matter will be an evidentiary hearing at which witnesses may testify with respect to disputed material factual issues in the manner directed by Fed. R. Bankr. P. 9014(d).

4. If a copy of the motion is not enclosed, a copy of the motion will be provided to you if you request a copy from the attorney named in paragraph 1(b).

5. You may contact the Bankruptcy Clerk's office at 215-408-2800 to find out whether the hearing has been canceled because no one filed an answer.

Date: October 9, 2017